

EXHIBIT 3

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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HYUNHUY NAM,

Plaintiff,

-against-

Case No. 1:21-cv-06165-AJN

PERMANENT MISSION OF THE REPUBLIC OF KOREA TO THE
UNITED NATIONS,

Defendants.

-----X

136-20 38th Avenue
Flushing, New York

April 4, 2022
10:25 A.M.

DEPOSITION of JO JINHO, a non-party witness on
behalf of the Defendant herein, taken by the
attorneys for their respective parties, pursuant
to Notice, held at the above time and place before
Maria Lemmo, a Stenotype Reporter and Notary Public
within and for the State of New York.

1 A P P E A R A N C E S:

2

3 HANG & ASSOCIATES, PLLC
Attorneys for Plaintiff
4 136-20 38th Avenue, Suite 10G
Flushing, New York 11354

5

BY: SHAN ZHU, ESQ.
6 YONGJIN BAE, ESQ.

7

KIM, CHO & LIM, LLC
8 Attorneys for Defendant
460 Bergen Boulevard, Suite 305
9 Palisades Park, New Jersey 07650

10 BY: JOSHUA S. LIM, ESQ.

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14 ALSO PRESENT:

15 SEAN KIM, Korean Interpreter
Eiber Translations

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2 S E A N K I M, the Korean Interpreter herein,
3 was duly sworn to interpret the questions from
4 English into Korean and the answers from Korean
5 into English, to the best of his ability:

6 J O J I N H O, the witness herein, having been
7 duly sworn through the Interpreter, was examined
8 and testified as follows:

9 EXAMINATION BY

10 SHAN ZHU, ESQ.:

11 Q. What is your name, please?

12 A. Jo Jinho.

13 Q. What is your address?

14 A. 335 East 45th Street, New York, New York
15 10017.

16 Q. Mr. Jinho, my name is Shan Zhu. I'm
17 counsel for Mr. Nan. Are you familiar with this
18 person?

19 A. Yes, I'm aware of him.

20 Q. Are you aware a few weeks before your
21 attorney has conducted Mr. Nan's deposition?

22 A. Yes.

23 Q. Is that true you were physically present
24 in that deposition as well?

25 A. Which deposition?

1 J. Jinho
2 various topics that the UN meetings deal with,
3 topics such as politics, economy, cultural
4 climate change, et cetera, these were the topics
5 that UN deals with. Among them, I work with
6 specifically the politics related work so that's
7 where I am involved with in terms of
8 participation among the variety of meetings that
9 take place there.

10 Q. Is there any other individual who has
11 been assigned to work on political affairs with
12 you concerning the meetings with UN?

13 A. Mr. Hyunhuy Nam, when he did the work as
14 he took care of the Ministers, those Ministers did
15 the same type of work that I did as a team, same
16 team.

17 Q. Can you spell the name of Mr. Nam that
18 you just testified?

19 MR. LIM: I think we can stipulate that
20 it was the name of the Plaintiff. Mr. Nam,
21 that he mentioned is actually the Plaintiff
22 in the pleading. He's referring to the
23 Plaintiff, H-Y-U-N-H-U-Y and N-A-M is his
24 last name.

25 Q. Earlier you said Mr. Nam, are you

1 J. Jinho

2 A. Got it.

3 Q. You're free to talk with him while
4 you're off the stand or excused as a witness. It
5 should not impair your ability to talk with him;
6 are we clear about this?

7 A. Yes, got it. I would like to see my
8 record the confirm whether the spelling is
9 C-H-U-N-G or J-U-N-G.

10 Q. You need to refer to a certain record.
11 Do you have any idea of what this record would
12 look like?

13 MR. LIM: You first named him as a
14 defendant. It got dismissed.

15 MR. ZHU: It's C-H-U-N-G.

16 A. Complaint.

17 Q. Back to the boss Minister maybe the last
18 name is Chung or Jung, can you tell me why you
19 refer to him or her as the boss Minister?

20 A. So this Minister, his work is something
21 that requires high level security. So therefore,
22 as according to the Republican of Korean's law,
23 he is categorized as a high level Minister of the
24 government. So therefore, Mr. Nam, his work was
25 to support someone who needed a high level

1 J. Jinho

2 stipulated the boss Minister the witness is
3 referring to his last is name C-H-U-N-G.

4 Q. So the question will be does Mr. Chung,
5 earlier you said the instruction, would those
6 instructions include your working schedule?

7 A. What exactly is the work schedule by
8 your definition, please?

9 Q. When I say working schedule, that means,
10 when you're supposed to start work, when you're
11 supposed to leave work in a given week, Monday,
12 Tuesday, Wednesday, Thursday, Friday; were those
13 instructions including your working schedules?

14 A. So basically as far as this type of work
15 related issues, we follow the Korean law, Korean
16 principles, so when one goes to vacation, we're
17 supposed to let them know beforehand giving
18 notification. And as far as the schedule part,
19 first of all, in general, the general practice is
20 we have to follow the general practice. However,
21 specifically depending on the real circumstances
22 of the day or time, we would discuss with Mr.
23 Chung the specific schedule together and based on
24 his instruction, it was followed. Based on his
25 decision, it was followed.

1 J. Jinho

2 MR. ZHU: If he don't understand --

3 MR. LIM: I just ask for clarification.

4 If the answer is fuzzy, I'll ask for
5 clarification.

6 A. Could you repeat that?

7 Q. Let me try another way to the extent of
8 your knowledge as to those instructions. Is there
9 any time that those instructions include when Mr.
10 Nam should report to work?

11 A. When to report to work?

12 Q. Yes.

13 A. So basically as far as Mr. Nam's time to
14 report to work and time to go home hours,
15 basically his work schedule you're asking, it was
16 already decided by the Korean law system as well
17 as general practice. Although, if there's some
18 task that needed to be done quickly and Mr. Nam
19 needed to come to work quickly, in those types of
20 cases, Minister Chung would tell directly to Mr.
21 Nam about it and that was what happened except
22 because we are the same team, we were aware that
23 that's the day that some important stuff is
24 happening so he's reporting to work early, so we
25 are kind of aware of it as well.

1 J. Jinho

2 MR. LIM: Let's spell the names
3 correctly. As defendant's counsel, I would
4 be more than happy to stipulate that Mr. Nam
5 worked for several Ministers in the past,
6 besides Mr. Chung who is also the Minister.
7 The names are as follows, I believe Mr. Nam
8 testified under oath last month, I believe
9 the first Minister he worked for from 2016
10 to 2017 B-O-N-G W-O-O K-O. The second
11 Minister Mr. Nam worked for was J-E-O-N-G,
12 J-A-E L-E-E, that's his last name. I
13 believe he worked for this Minister Lee from
14 2018 through 2019 or whatever the contract
15 provides. Then the third Minister he worked
16 for was K-Y-U-N-G Y-U-L H-A-N. These are
17 the Ministers Mr. Nam worked for in the
18 past. Beginning from 2016 and I believe
19 Minister Chung.

20 I want to clarify the record. I'll be
21 happy to stipulate that Mr. Nam worked for
22 several Ministers the names of which were
23 announced a minute ago. The sequence in
24 terms of who he worked for and when he
25 worked for, I believe, the sequence goes

1 J. Jinho

2 something like this Minister Ko first and
3 Minister Han next and Minister Lee third and
4 Minister Chung last. So Mr. Nam worked for
5 these Ministers in the manner that I just
6 indicated. Are we clear about this?

7 MR. ZHU: Yes.

8 MR. LIM: I'll be more than happy to
9 stipulate.

10 Q. While you and Mr. Nam working as a team,
11 can you describe Mr. Nam's job function?

12 A. So Mr. Nam was doing the task of
13 supporting the foreign affairs Minister, such as
14 Minister Chung, who required high level security,
15 and since Minister Chung is someone who is
16 categorized as a high level officer and Mr. Nam
17 was the head. Mr. Nam had no other choice but to
18 come to know where Minister Chung is going, with
19 whom he is meeting with and what kind of
20 conversation he's having with that other person,
21 in what location. Since that was what he was
22 doing and because Mr. Nam had this special
23 characteristic of a job that he would be able to
24 find out information such as top secret
25 information, classified information in the process

1 J. Jinho
2 of working with Minister Chung. So therefore,
3 Mr. Nam needed a separate security clearance from
4 us. From the time of the employment, Mr. Nam was
5 required to the background check, of course with
6 his agreement to that and every year that is why
7 we required his signature for renewed security,
8 security pledges and because of that his job
9 function -- you told me to make it brief earlier,
10 but could I add to that --

11 MR. ZHU: Please go ahead.

12 A. For example because Mr. Nam's job
13 required this type of high level security, to
14 give an example let's say if a cabinet level VIP
15 is visiting from the Republic of Korea, Mr.
16 Nam's car was used to give transportation for
17 such individual in the same car with Minister
18 Chung, and of course because of security reason
19 I cannot reveal of this information, but at one
20 point Mr. Nam directly drove national security
21 advisor to the president himself even.

22 Q. Isn't Mr. Nam's function as a driver of
23 Ministers although he often time need a security
24 clearance from time to time?

25 A. Well, the responsibility of Mr. Nam's,

1 J. Jinho

2 yes, his main job is the vehicle operation of
3 Minister, that was what he was assigned to do as
4 his main job, but other than that what is
5 included in this contract is diplomatic protocol
6 work admission work is also included as well.

7 MR. LIM: Objection to the translation.

8 He used to word designated.

9 A. Who drove was the designated Minister's
10 vehicle.

11 MR. LIM: Are we clear that we have a
12 correct translation that he was a driver for
13 the designated Minister's vehicle? Off the
14 record.

15 (Whereupon a discussion was held off the
16 record.)

17 MR. LIM: We have pre-marked certain
18 exhibits which were used for Mr. Nam's
19 deposition. To avoid confusion, we would
20 rather use the same exhibits so that we're
21 referring to the same documents we can
22 stipulate --

23 MR. BAE: We will call it Plaintiff's 1.

24 MR. LIM: I thought we already marked it
25 as P1. Why don't you refer to it as P1 so

1 J. Jinho

2 lay the foundation.

3 A. I don't mean that at all. My point is
4 this: what I was pointing out was Mr. Nam's work
5 hours, whether it's overtime hours or whatnot, it
6 was an honor system where Mr. Nam was the one who
7 wrote it himself, and whatever he wrote was
8 confirmed. That was the system and the reason
9 that I'm pointing that out is because you pointed
10 out that Mr. Nam's starting work time is way
11 earlier always than what the contract says, but
12 I'm pointing out that that is what Mr. Nam agreed
13 to voluntarily and because he said that is
14 possible and that means that before it was done
15 it was discussed. That's what I'm pointing out.

16 Q. Let me ask a different question. How
17 did you hire Mr. Nam?

18 MR. LIM: Do you mean the Mission, not
19 him individually, how did the Mission hire
20 Mr. Nam?

21 MR. BAE: Yes.

22 A. So basically it's the same process. It
23 is according to the principal set by the Korea
24 and the general practice, a person is hired. So
25 initially there's a help wanted that is put up in

1 J. Jinho

2 participated in these interviews where you obtain
3 the candidate from either third-party website or
4 Mission's official website?

5 A. So first of all, Mr. Nam's case, the
6 person who was in charge at the time who was Mr.
7 C-H-O-I was the one, and the Minister who was
8 there at the time Mr. Ko was the one who
9 conducted the interview.

10 Q. What is the position of Mr. Choi?

11 A. So Mr. Choi's position was
12 administratively manager, the position like Mr.
13 Nam's.

14 Q. Do you consider Mr. Choi diplomatic
15 staff?

16 A. Yes.

17 Q. Based on your knowledge, did Mr. Choi
18 register with the Department of State?

19 A. Of course, yes.

20 Q. Based on your knowledge, does Mr. Nam,
21 did or does, Mr. Nam register with the Department
22 of State?

23 MR. LIM: As a diplomatic staff? Is
24 that the question?

25 MR. ZHU: Yes.

1 J. Jinho

2 Based on your knowledge who decides whether
3 the person should be hired by the Mission other
4 than the security check?

5 MR. LIM: Not an objection, but we're
6 talking about general practice, not Mr. Nam?

7 MR. ZHU: Yes.

8 MR. LIM: I'm afraid every position is
9 different. I don't know where we're going
10 with this.

11 A. Well, in Mr. Nam's case it would be the
12 Minister who Mr. Nam would directly serve in the
13 end, so finally it would be the Minister who would
14 say oh, this person looks good.

15 Q. Have the Mission ever fired anybody?

16 MR. LIM: What's the timeframe?

17 Q. From the year 2016 until present based
18 on your knowledge?

19 A. To my understanding, no.

20 Q. Based on your understanding, is there a
21 firing process employed by the Mission?

22 MR. LIM: Again he used a word and I
23 just want to clarify. Are you talking about
24 voluntary termination or involuntary, firing
25 is involuntary. He used the word it includes

1 J. Jinho

2 to Mr. Nam as diplomatic staff.

3 MR. LIM: He already said several times
4 he was not registered, he was not a
5 diplomatic staff.

6 A. I never said that.

7 Q. There's a misunderstanding. I heard you
8 talk Mr. Nam has not registered with diplomat
9 Department of State, but you mentioned Mr. Nam
10 was diplomatic staff, no?

11 A. Never said that. What I was thinking at
12 the time briefly was that in the case of Mr. Nam,
13 so what happens is there's a week called high
14 level week and general UN, general assembly. In
15 that type of period, the whole neighborhood
16 around the UN is blocked. So as part of the UN
17 representative team, Mr. Nam receives a pass to
18 get through that traffic, security pass and in
19 that sense he was registered, in that sense.
20 That's what I was briefly contemplating there.

21 Q. Regardless of registering issue, do you
22 think Mr. Nam worked as a diplomatic staff or
23 non-diplomatic staff?

24 MR. LIM: Asked and answered.

25 A. Like I told you earlier, he worked as a

1 J. Jinho

2 non-diplomatic staff.

3 MR. LIM: For the record, he did say
4 that Mr. Nam was registered with the UN in
5 order to receive a security pass during the
6 high level week. Your question was whether
7 he was registered with the Department of
8 State. He said no, he was registered with
9 the UN during the high level week to receive
10 a security pass. Are we clear?

11 CONTINUED EXAMINATION BY

12 SHAN ZHU:

13 Q. Is that true the registration of Mr. Nam
14 to the UN is for limited event or he was
15 registered throughout this employment period?

16 A. So there are the security passes that's
17 the only issued for that period of time for that
18 event, so Mr. Nam received that pass.

19 MR. BAE: Mark this as Plaintiff's 3,
20 P3.

21 (Whereupon security pass was marked
22 Plaintiff's Exhibit 3 for Identification.

23 MR. LIM: Did you produce this during
24 Discovery? I don't think you did. The
25 exhibit that was just marked as P3 is what

1 J. Jinho

2 CONTINUED EXAMINATION BY

3 YONGJIN BAE:

4 Q. As to background check, diplomatic staff
5 and non-diplomatic staff are both required to go
6 through background check?

7 A. In general, yes.

8 Q. But it's not specific occasion for Mr.
9 Nam, right?

10 MR. LIM: Do you mean it's not even
11 special?

12 Q. I'm rephrasing my question, I'm sorry.
13 Mr. Nam is not the only person along
14 non-diplomatic employees who have been going
15 through security background check?

16 MR. LIM: Off the record.

17 (Whereupon a discussion was held off the
18 record.)

19 MR. LIM: The question is whether or not
20 Mr. Nam had to go through different security
21 clearance compared to other non-diplomatic
22 staff. Is that your question?

23 MR. BAE: That is correct.

24 A. So like I said earlier, Mr. Nam had a
25 task to help the Minister who needed the high

1 J. Jinho

2 level security, so compared to other
3 non-diplomatic staff, Mr. Nam had to go through
4 high level security clearance and every year he
5 had to fill out the security pledge to renew it,
6 and he even said that he would voluntarily go
7 through polygraph test and he agreed to do that
8 and all these matters all written in the contract
9 already, and no one else went through such
10 security clearance like Mr. Nam for other
11 non-diplomatic staff.

12 Q. Was Mr. Nam the only driver at Missions?

13 MR. LIM: From 2016 to 2020, correct?

14 MR. BAE: Yes.

15 A. No, not so. There were other drivers as
16 well.

17 Q. Why the other driver has not gone
18 through security clearance?

19 A. The reason is that Mr. Nam's position
20 required to work for the Minister who requires
21 high level security and therefore, whoever
22 Minister meets, what kind of discussion Minister
23 has or whatever discussion is taking place in the
24 car, Mr. Nam was in a position to find out
25 naturally. So being that the case, those kind of

1 J. Jinho

2 information were top secret or classified
3 information based on the Republican Korean law
4 and this is something that Mr. Nam is fully aware
5 of and fully known, and that is why he had to go
6 through high security clearance unlike other
7 non-diplomatic staff.

8 Q. Is there a designated driver for
9 Ambassador Cho?

10 A. Yes, there is?

11 Q. What's difference between Mr. Nam and
12 Ambassador Cho driver? Ambassador Cho should be
13 higher than Minister ranking, right?

14 A. So I believe the biggest difference is
15 whether the person is Korean citizen or not and
16 whether the person could speak Korean language or
17 not.

18 MR. LIM: I think the question is
19 whether or not the ambassador's driver is
20 subject to the same security clearance; is
21 that your question?

22 A. As a reference, of course, the
23 Ambassador is also high level security required
24 individuals so therefore Ambassador's driver also
25 is required a very special security clearance as

1 J. Jinho

2 of all, it is fact that Mr. Nam went through the
3 high level security clearance and he's the only
4 person, Mr. Nam was the only one. However, since
5 your question was, wasn't that required for the
6 Ambassador's driver as well so wouldn't it have
7 been possible. So my thought was that, yes, that
8 can be something that I could verify or confirm
9 or find out. To my knowledge --

10 THE INTERPRETER: And that's when the
11 counsel interjected something, but again the
12 witness goes on.

13 A. Let me put it this way, the Ambassador's
14 driver is something that I have to verify
15 additionally, but to my knowledge, Mr. Nam was
16 the unique non-diplomatic personnel who had to go
17 through the security clearance as well as every
18 year had to submit the pledge to renew it.

19 MR. BAE: Nothing further.

20 CONTINUED EXAMINATION BY

21 SHAN ZHU:

22 Q. I want to draw your attention to P2 so
23 for your time record, can you generally tell me
24 how this document was, if you can go through and
25 let me know if you're ready.

1 J. Jinho

2 knowledge, that was what happened.

3 One thing I want to add, as you already
4 know, this form is basically the form by the
5 Korean government, that Korean government uses
6 and from 2016 until the present time, they remain
7 almost the same identical and Mr. Nam probably
8 has all the copies from the past as well, and so
9 if Mr. Nam wanted to think about what was
10 explained at that meeting, if he requested it,
11 that was probably granted and then signed later
12 probably, but to my understanding this procedure
13 is followed according to the general practice.

14 Q. So do you know for this specific
15 contract we're looking at whether Mr. Nam signed
16 this contract on the spot?

17 A. To my understanding, yes, that was done.

18 Q. Does mission have EIN number?

19 MR. LIM: You have to explain what that
20 is. It's a tax ID number.

21 A. To my understanding, the Mission is
22 subject to the -- to my understanding the Mission
23 is tax exempt status.

24 Q. That's not my question. My question is
25 regardless of whether it Mission is tax except or

1 J. Jinho

2 reflected in the contract.

3 Q. Is there any written document you gave
4 to Mr. Nam which document how his wage being
5 calculated other than on the paid ledger in front
6 of you, the ledger meaning P2?

7 A. So you're asking other than this ledger
8 is there any other document?

9 Q. Right.

10 A. To my understanding there is nothing
11 else.

12 Q. If you may go back to the contract term
13 five, let's say if you're going to go back to P1
14 term five, so other than the regular wage there
15 are housing, medical insurance and the off
16 schedule wage phone access. So based on your
17 understanding, if any of them is discretionary by
18 the Mission?

19 A. So depending on the cases, there
20 occasions where we give out like encouraging
21 money or encouraging funds so called. For
22 example, at the end of the year or after big
23 events, to express our sort of gratitude good
24 work guys, type of thing.

25 Q. Let me try another way. Under term 5-2

1 J. Jinho

2 it says housing \$1,450 per month. Is this amount
3 discretionary by Mission or Mission will give to
4 Mr. Nam regardless of his work?

5 A. So this is a condition where basically
6 that amount is given out monthly.

7 Q. Why you say basically, is there any
8 exception when the housing is not paid?

9 A. To my understanding as to Mr. Nam, there
10 wasn't.

11 Q. Let's move onto the medical insurance, a
12 \$1,087 per month, would you consider this
13 discretionary from the Mission?

14 MR. LIM: Versus mandatory? I don't
15 understand.

16 MR. ZHU: Discretionary meaning that
17 Mission determined whether to give his or
18 not. Non-discretionary meaning that Mission
19 will give it to Mr. Nam regardless of his
20 work performance.

21 A. So it is non-discretionary. So I said
22 earlier, this was a basic form that Republican of
23 Korean government uses so it is not kind of
24 characteristic where if an employee or Mr. Nam is
25 lazy and not work, this is not given, it is

1 J. Jinho

2 given.

3 Q. What about the \$1,900 bonus per year
4 described in term four, is that discretionary or
5 not?

6 A. Non-discretionary.

7 MR. ZHU: I don't have further question
8 for you Mr. Jo so my colleague will take
9 over.

10 CONTINUED EXAMINATION BY

11 YONGJIN BAE:

12 Q. Mr. Jo, I have few questions before you
13 are being excused.

14 A. Yes.

15 Q. How many hours do you work per week?

16 MR. LIM: Objection to that question.

17 It's not about him individually. He's a
18 representative of the Mission.

19 Q. Is it common that any employees in
20 Mission working 92 hours per week, more than 92
21 hours per week?

22 MR. LIM: You're asking such a broad
23 question.

24 Q. I want to know general practice.

25 A. Basically it is fact that employees who

1 J. Jinho

2 work at missions work overtime hours, meaning
3 overnight work.

4 Q. According to the employment contract
5 between Mission and Mr. Nam in 2016, his overtime
6 was capped by \$570 per month, right?

7 A. Yes, that is correct.

8 Q. In 2017, there was some change from
9 South Korean law regarding working hours called
10 capped 52 hours that applies to all organization
11 in Korea?

12 MR. LIM: What do you mean by
13 organization?

14 MR. BAE: Whether government or private
15 entity. Mission shouldn't be applied at 52
16 hours. That's the reason why 52 hours
17 capped.

18 MR. LIM: There are exceptions, you know
19 that, right? That law doesn't apply.

20 MR. BAE: But here it applies.

21 MR. LIM: You didn't ask whether it
22 applies, that's why I'm confused. Are you
23 aware of the law? You skipped that, that's
24 why I don't understand.

25 Q. One question here did Mr. Nam have any

1 J. Jinho
2 to the Mission's building while the Minister was
3 having a meal at the meeting place, at the
4 restaurant. So sometimes if it takes two hours
5 then Mr. Nam would come back to pick him up
6 according to that hour. That is my understanding
7 of how it was done, and occasionally when the
8 meeting place was somewhere far that is when Mr.
9 Nam waited outside the restaurant until it was
10 done which happened not frequently.

11 MR. BAE: No further questions.

12 EXAMINATION BY

13 JOSHUA LIM:

14 Q. Mr. Jo, you have come a long way. I'm
15 just going to ask a few follow-up questions.
16 Let's talk about the UN high level week that you
17 mentioned earlier. Tell us a little bit about
18 what that is?

19 A. So what UN does on usually, typically
20 about September month, they open up this event
21 called general assembly high level week which
22 invites the head of each of the states and they
23 participate in this event.

24 Q. So during the time that Mr. Nam was
25 working for the Mission, did this high level week

1 J. Jinho

2 event occur every year?

3 A. Other than the year of the pandemic
4 which is 2020, it took place every year, correct.

5 Q. So for this event, the high level
6 government officials from Korea come to
7 participate in this event?

8 A. Correct.

9 Q. When you say high level, are they high
10 level government cabinet officials?

11 A. Correct.

12 Q. After they arrive, where these high
13 level government officials go, is that considered
14 a secret by Korean law?

15 A. That is correct because this has to do
16 with the safety and security issues. So whenever
17 VIP visits, whether it's high level week or not,
18 so it's that just high level week apply, but
19 other week, the routes where they go is kept
20 secret and it's not revealed.

21 Q. Prior to the arrival of these high level
22 government officials, did the mission ever
23 inspect the route beforehand?

24 A. That is correct. This is very important
25 matter in terms of security, so before the event

1 J. Jinho

2 take place Mission visits the route and the
3 location of the event beforehand and do those
4 things.

5 Q. Was this information concerning the
6 route known and shared with Mr. Nam?

7 A. So basically Mr. Nam's job and his role
8 is to help the work of the Minister in foreign
9 affairs with the high level security requirement
10 needed. So therefore, it is very challenging to
11 separate Mr. Nam and Minister. There is some
12 aspect to that, it's difficult to do that. So
13 obviously, before the events take place, the
14 information with regard to the route and the
15 visitation of the location beforehand, those
16 information is shared with Mr. Nam.

17 Q. When these high level government
18 officials came from Korea who shuffled them
19 around?

20 A. So Mr. Nam did the work of chauffeuring
21 these cabinet level VIPs related to that work.
22 For example, there was national security advisor
23 to the president who visited and it was Mr. Nam
24 who chauffeured that cabinet member, and other
25 than that, there are many other places in

1 J. Jinho

2 personnel that Mr. Nam chauffeured, but I think
3 it is inappropriate to divulge this information
4 here.

5 Q. When the national security advisor to
6 the president came, did the Mission receive
7 assistance from the local law enforcement?

8 A. Yes, like I said, this type of VIP visit
9 requires a very important security protocol, so
10 of course local law enforcement work together
11 with them and, of course, Mr. Nam was sort of a
12 team when he worked in that capacity.

13 Q. When the mission worked with a local law
14 enforcement, did the local law enforcement give
15 instructions as to how they would guide the high
16 government officials?

17 A. That is correct. Guidelines were
18 provided because they have to move together.

19 Q. Is it fair to say there was a motorcade?

20 A. Yes, there was a motorcade.

21 Q. Did Mr. Nam receive information
22 concerning how the motorcade will be done?

23 A. That is correct, because at occasions the
24 motorcade have to move very quickly so obviously
25 also Mr. Nam was provided with the guidelines.

1 A C K N O W L E D G M E N T :

2

3 STATE OF NEW YORK)

4) ss.:

5 COUNTY OF)

6 I, JO JINHO, hereby certify that I
7 have read the transcript of my testimony taken
8 under oath in my deposition of April 4, 2022;
9 that the transcript is a true, complete and
10 correct record of what was asked, answered and
11 said during this deposition, and that the
12 answers on the record as given by me are true
13 and correct.

14

15

16

17

JO JINHO

18 Subscribed and sworn to

19 before me this ____ day

20 of _____, 2022.

21

22

23

NOTARY PUBLIC

24

25

1 I N D E X

2

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1 C E R T I F I C A T I O N

2

3 I, MARIA LEMMO, a Notary Public of the
4 State of New York do hereby certify:

5 That the testimony in the within
6 proceeding was held before me at the aforesaid
7 time and place.

8 That said witness was duly sworn before
9 the commencement of the testimony, and that the
10 testimony was taken stenographically by me, then
11 transcribed under my supervisor, and that the
12 within transcript is a true record of the
13 testimony of said witness.

14 I further certify that I am not related
15 to any of the parties to this action by blood or
16 marriage, that I am not interested directly or
17 indirectly in the matter in controversy, nor am I
18 in the employ of any of the counsel.

19 IN WITNESS WHEREOF, I have hereunto set
20 my hand this 27th day of April, 2022.

21

22

23

24

25



Maria Lemmo

MARIA LEMMO

